

Exhibit B

FOX ROTHSCHILD LLP

CHRISTINE F. MARKS (024631990)
JOSEPH J. DiPASQUALE (016191994)
KIERAN T. ENSOR (305662019)
49 Market Street
Morristown, New Jersey 07960-5122
Telephone: 973.992.4800
Facsimile: 973.992.9125
CMarks@FoxRothschild.com
JDipasquale@FoxRothschild.com
KEnsor@FoxRothschild.com

LAW OFFICES OF TIMOTHY KEBBE

TIMOTHY P. KEBBE (Pro Hac Vice Pending)
245 Saw Mill River Road, Suite 106
Hawthorne, New York 10532
Phone 914.733.7745
tkebbe@kebbelaw.com

Attorneys for Plaintiff, Legal Bay LLC

LEGAL BAY LLC,

Plaintiff,

vs.

MUSTANG FUNDING, LLC, MUSTANG
SPECIALTY FUNDING I, LLC, MUSTANG
SPECIALTY FUNDING II, LLC, JAMES
BELTZ and KEVIN CAVANAUGH,

Defendants.

SUPERIOR COURT OF NEW JERSEY
ESSEX COUNTY – CHANCERY DIVISION

Civil Action

Docket No.: ESX-C-86-22

**CERTIFICATION OF
DILIGENT INQUIRY AND PERSONAL
SERVICE UPON DEFENDANT
MUSTANG FUNDING LLC**

KIERAN T. ENSOR, ESQ., of full age, hereby states as follows:

1. I am an attorney-at-law of the State of New Jersey and an associate with the law firm of Fox Rothschild, LLP, attorneys for Plaintiff, Legal Bay, LLC (“Legal Bay”). This certification is made based upon my personal knowledge, pursuant to Rule 4:4-4(b)(1)(A), to

effectuate service of Legal Bay's Verified Complaint and Summons on Defendant Mustang Funding, LLC ("Mustang").

2. Prior to the filing of Legal Bay's Verified Complaint on May 16, 2022, I requested that my firm's Knowledge Management Department determine whether Mustang had a New Jersey address, a registered agent in New Jersey, or was a business entity registered to transact business in New Jersey, so process could be effectuated upon it within New Jersey, pursuant to Rule 4:4-4(a).

3. Based upon the results of that search, and my own additional investigation, inclusive of a search of the New Jersey Department of the Treasury, Division of Revenue and Enterprise Services "Business Name Search", Mustang does not have a place of business in New Jersey, is a foreign business entity, and is not registered in New Jersey, with a principal place of business located at Suite 250, 701 Lake Street East, Wayzata, Minnesota.

4. Pursuant to Rule 4:4-4(b)(1)(A), Mustang was personally served a copy of the Summons and Verified Complaint on May 18, 2022, at 3:48 p.m. at Suite 250, 701 Lake Street East, Wayzata, Minnesota by leaving a copy of all relevant items with James Beltz, the manager of Mustang and an individual qualified to accept service on behalf of Mustang. A true and correct copy of the Affidavit of Service is annexed hereto as **Exhibit A**.

I hereby certify that the foregoing statements made by me are true. I understand that if any of the foregoing statements made by me are willingly false, I am subject to punishment.


KIERAN T. ENSOR

Dated: June 8, 2022

Exhibit A

State of New Jersey

SUPERIOR COURT

County of Essex

Legal Bay LLC

Court File Number

Plaintiff,

ESX-C-000086-22

vs.

Mustang Funding, LLC, et al.

Defendant,

Affidavit of Service

State of Minnesota

County of Hennepin

}

Neil Hanson, being duly sworn, on oath says that on Wednesday, May 18, 2022 at 3:48 PM he served the Summons, Complaint, & Exhibits upon Mustang Funding, LLC, therein named, personally at Suite 250, 701 Lake Street East, Wayzata, MN 55391, by handing to and leaving with James Beltz, Manager of said Mustang Funding, LLC, a true and correct copy thereof.



5/18/2022

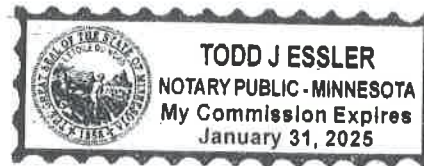
Neil Hanson, Process Server

Subscribed and Sworn to before me on

5/18/2022



(Signature of Notary)



2538942 - 1